

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
BALTIMORE DIVISION**

JASON ALFORD *et al.*,

Plaintiffs,

v.

THE NFL PLAYER DISABILITY &
SURVIVOR BENEFIT PLAN *et al.*,

Defendants.

Case No. 1:23-cv-00358-JRR

**PLAINTIFFS' RESPONSE REGARDING DEFENDANTS'
RULE 26(a)(2) DISCLOSURE DEADLINE**

Pursuant to the Court's Order (ECF No. 183), Plaintiffs do not oppose setting a new date for Defendants' Rule 26(a)(2) disclosure deadline. Plaintiffs are unaware of any currently operative deadline for Defendants' Rule 26(a)(2) disclosures that could be held in abeyance because the most recent prior Scheduling Order addressing Defendants' disclosures had set a deadline of March 6, 2025. *See* ECF No. 120. Regardless, as stated in Defendants' motion, the parties are currently working cooperatively to negotiate a new schedule for the Court's consideration that will include a proposed deadline for Defendants' Rule 26(a)(2) disclosures and Plaintiffs' rebuttal disclosures. Those negotiations will involve related issues such as the timing of Defendants' expert disclosures and depositions of Plaintiffs' experts. Therefore, Plaintiffs respectfully submit that it is unnecessary for the Court to enter a new deadline for Defendants' Rule 26(a)(2) disclosures at this time while the parties complete their ongoing negotiation of a new proposed Scheduling Order.

Dated: April 28, 2025

Respectfully submitted,

SEEGER WEISS LLP

By: s/ Benjamin R. Barnett
Benjamin R. Barnett
SEEGER WEISS LLP
325 Chestnut St, Suite 917
Philadelphia, PA 19106
Telephone: (215) 553-7980
bbarnett@seegerweiss.com

*Counsel for Plaintiffs and for the
Proposed Class and Subclasses*

Christopher A. Seeger (*admitted pro hac vice*)
Diogenes P. Kekatos (*admitted pro hac vice*)
Caleb A. Seeley (*admitted pro hac vice*)
Hillary R. Fidler (*admitted pro hac vice*)

SEEGER WEISS LLP
55 Challenger Road, 6th Floor
Ridgefield Park, NJ 07660
Telephone: (973) 639-9100
cseeger@seegerweiss.com
dkekatos@seegereiss.com
cseeley@seegerweiss.com
hfidler@seegerweiss.com

Samuel L. Katz (*admitted pro hac vice*)
Julia M. Damron (*admitted pro hac vice*)

ATHLAW LLP
8383 Wilshire Blvd., Suite 800
Beverly Hills, CA 90211
Telephone: (818) 454-3652
samkatz@athlawllp.com
julia@athlawllp.com

Bryan F. Aylstock (*admitted pro hac vice*)
Justin G. Witkin (*admitted pro hac vice*)
Douglass A. Kreis (*admitted pro hac vice*)
D. Nicole Guntner (*admitted pro hac vice*)
Bobby J. Bradford (*admitted pro hac vice*)
AYLSTOCK, WITKIN, KREIS, & OVERHOLTZ, PLLC
17 E. Main Street, Suite 200

Pensacola, FL 32502
Telephone: (850) 202-1010
BAylstock@awkolaw.com
JWitkin@awkolaw.com
DKreis@awkolaw.com
NGuntner@awkolaw.com
BBradford@awkolaw.com

***Counsel for Plaintiffs and for the
Proposed Class and Subclasses***

Jason S. Rathod
Nicholas A. Migliaccio
MIGLIACCIO & RATHOD LLP
412 H Street, N.E.
Washington, DC 20002
Telephone: (202) 470-3520
jrathod@classlawdc.com
nmigliaccio@classlawdc.com

***Counsel for Plaintiffs and Liaison Counsel
for the Proposed Class and Subclasses***

Robert K. Scott (*admitted pro hac vice*)
Gerry H. Goldsholle (*admitted pro hac vice*)
ADVOCATE LAW GROUP P.C.
2330 Marinship Way, Suite 260
Sausalito, CA 94965
Telephone: (949) 753-4950
bob@advocatelawgroup.com
gerry@advocatelawgroup.com

Additional Counsel for Plaintiffs